



State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES

6 Hazen Drive, P.O. Box 95, Concord, NH 03302-0095

603-271-3503 FAX 603-271-2867

TDD Access: Relay NH 1-800-735-2964



April 7, 1994

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

**LETTER OF DEFICIENCY
No. WMD-94-05**

Mr. Bob Bean
Plant Engineer
Johnson & Johnston Associates, Inc.
130 Route 111
Hampstead, New Hampshire 03841

**RE: Johnson & Johnston Associates, Inc., 130 Route 111, Hampstead, NH
NHD980909451**

Dear Mr. Bean:

On February 22, Services, Waste Management the above referenced determine the compliance (JJA), with RSA Chapter Hampshire Hazardous Waste inspection was carried out RSA Ch. 147-A.

As a result of furnished to the Department documented:

1. Env-Wm 502.01 -

At the time of contents of one container, located

Env-Wm 502.01 r their waste is

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.

Write "Return Receipt Requested" on the mailpiece next to

3. Article Addressed to:

ROBERT BEAN
PLANT ENGINEER
JOHNSON & JOHNSTON ASSOC INC
130 ROUTE 111
HAMPSTEAD NH 03841

5. Signature (Addressee)

6. Signature (Agent)

I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

4a. Article Number

P 385 944 881

4b. Service Type

- ☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery

4-11-94

8. Addressee's Address (Only if requested and fee is paid)

APR 7 1994

PS Form 3811, October 1990

★U.S. GPO: 1990-273-861

DOMESTIC RETURN RECEIPT

DEPT. OF ENVIRONMENTAL SERVICES
WASTE MANAGEMENT DIVISION

The Department requests that JJA perform a hazardous waste determination as specified in Env-Wm 502.01, on the contents of the two (2) containers, and dispose of these wastes appropriately based on the determination. The Department requests that JJA submit the results along with any other supporting data to the Department. Waste determined to be hazardous must be handled pursuant to the requirements of the Hazardous Waste Rules, Env-Wm 100-1000.

AIR RESOURCES DIV.
64 No. Main Street
Caller Box 2033
Concord, N.H. 03302-2033
Tel. 603-271-1370
Fax 603-271-1381

WASTE MANAGEMENT DIV.
6 Hazen Drive
Concord, N.H. 03301
Tel. 603-271-2900
Fax 603-271-2456

WATER RESOURCES DIV.
64 No. Main Street
P.O. Box 2008
Concord, N.H. 03302-2008
Tel. 603-271-3406
Fax 603-271-6588

WATER SUPPLY & POLLUTION CONTROL DIV.
P.O. Box 95
Concord, N.H. 03302-0095
Tel. 603-271-3503
Fax 603-271-2181

HAZARDOUS WASTE GENERATOR RCRA INSPECTION CHECKLIST

Site Name: Johnson & Johnston Associates, Inc.

Site Location: 130 Route 111 Hampstead, New Hampshire 03841

Mailing Address: 130 Route 111 Hampstead, New Hampshire 03841

E.P.A. I.D. Number: NHD980909451 Phone Number: 603-329-5691

Is the site within a wellhead protection area, Merrimack or Connecticut River watershed? no

Industry Representatives: Bob Bean, plant engineer

Address Correspondence to: Bob Bean, plant engineer

Company Pres.: John Johnston, 130 Route 111 Hampstead, New Hampshire 03841

Property Owner: D. John Realty

Past Ownership & Activity: (years at site, name change, etc.) unknown
Johnson & Johnston Associates, Inc. on-site for 15 years

No. of Employees: 70 No. of Shifts: 3 Shift Hours: 7-3pm/3-11/11-7

Prior Inspections: none

Previous Enforcement Actions: none

INSPECTION DATE: February 22, 1994 Facility Type (FOG, SQG): FOG (100-1000)

DES Inspectors: Stergios K. Spanos, Dave Bowen

primary inspector's signature: *Stergios K. Spanos*

I. PRE-INSPECTION MEETING:

A. Facility Permits, Treatment/Disposal

Permits Issued: Air Resources Division permits

Variances/Waivers: none

Underground Storage Tanks: none

1. Where does the facility receive its water supply? well

2. Does the facility discharge to a sewer system? no If yes:

a) What POTW accepts the discharge? NA

b) What industrial wastes are discharged? NA

c) Is the facility in compliance with the local sewer ordinance?
(Any analysis, etc.) NA

d) Are pretreatment standards (if any) met? NA

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3. Does the facility have any industrial discharges to a septic system or drywell? no

4. Does the facility treat any wastes on site? no

If yes, explain: ---

5. Does the facility have any transformers or capacitors on site? no

a) How old are the transformers or capacitors? NA

b) Do they contain PCB's? NA

6. Does the facility have an elementary Neutralization Unit/Wastewater Treatment Unit (ENU/WWTU)? [Env-Wm 353.05(b)] no

If yes:

a) Has the company filed a notification form? NA

b) Has a Permit-By-Rule (PBR) been approved? NA

c) Does the facility comply with the NH Permit-by-Rule requirements? NA

B. General Information (Process Description, etc.)

Johnson & Johnston Associates, Inc. (JJA) is a converter of aluminum stock.
Aluminum stock in 4,000 pound mill rolls is unwound and degreased. JJA
has three (3) trichloroethylene degreasers, which are the primary source
for the hazardous waste generated on-site. JJA has two machines which glue
copper to the aluminum. The product is sold to platers for computer
applications.

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II. FACILITY TOUR:

A. Storage Practices

1. How are wastes stored? (containers or tanks) containers
2. Are wastes stored outside? [Env-Wm 509.02(c)] no
 - a) If so, is a barrier present? na
 - b) If so, is access to area controlled? na
 - c) If so, is a sign restricting entry by unauthorized personnel present? na
 - d) If containers are stored outside, are the following conditions evident: [Env-Wm 507.01(d)]
 - i. Are the containers kept covered; and na
 - ii. Are any surface waters within 50 feet of the containers? na
3. Does the facility utilize the following storage options:
 - a) Small quantity generator extended storage? [Env-Wm 508.03] (see page 11) no
 - b) Storage at the point of generation for less than 12 hours? [Env-Wm 507.01(g)] (see page 11) no
 - c) Full quantity generator satellite storage? [Env-Wm 509.03] (see page 11) no
4. Does the facility utilize designated hazardous waste storage areas? yes
5. Labelling: [Env-Wm 507.02(a)(3), 507.03(a)(1), 507.03(a)(2)/509.02(a)(4)] (see page 4)
6. Containers: [Env-Wm 507.01] (see page 5)
7. Tanks: [Env-Wm 509.02(a)(7), adopted 40 CFR Part 265 Subpart J]
 - a) Is there evidence of leaks/ruptures/spills? na
 - b) Are there signs of corrosion (check valves)? na
 - c) Is there adequate freeboard for uncovered tanks? na
 - d) Are there controls to provide for continuous inflow and means to stop outflow? na
8. Storage location: [Env-Wm 506.01]
 - a) Does storage/location pose a potential threat to human health or the environment? OK

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5. Labelling: [Env-Wm 507.02(a) (3), 507.03(a) (1), 507.03(a) (2)/509.02(a) (4)]

hazardous waste storage area	main hwsa						
a) Is hw shipped off-site within 90 days of the doa? 507.02(a) (3)	OK						
b) Are doa marked? 507.03(a) (1)a.	OK						
c) Are the words "hazardous waste" marked? 507.03(a) (1)b.	OK						
d) Are words that identify the contents marked? 507.03(a) (1)c.	OK						
e) Are the EPA or State waste numbers marked? 507.03(a) (1)d.	OK						
f) Are hw labels unobscured and accessible? 507.03(a) (2) 509.02(a) (4)	OK						

*: hazardous waste containers in the warehouse were inaccessible

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6. Containers: [Env-Wm 507.01]

hazardous waste storage area	main hwsa						
a) signs of leaks? 507.01(a)(2)	OK						
b) signs of heat and/or pressure? 507.01(a)(2)	OK						
c) signs of corrosion? 507.01(a)(2)	OK						
d) bungs and lids closed and sealed? 507.01(a)(3)	OK						
e) stored on impervious surfaces? 507.01(b)	OK						
f) floor drains or manholes present? 507.01(c)	OK						
i) if yes, is secondary containment (2°) present? and	-						
ii) is 2° capable of containing the volume of the largest container?	-						

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B. Preparedness and Prevention

[Env-Wm 509.02(a)(4), adopted 40 CFR Part 265, Subpart C]

1. Testing and maintenance of equipment: OK
2. Adequate aisle space between containers:
(not less than 2 feet) OK
3. Arrangements with local authorities:
 - a) Plant layout OK
 - b) Properties of hazardous waste OK
4. Hazardous waste storage area emergency equipment:
[Env-Wm 509.02(a)(4), 509.02(b)] (see page 7)

C. Emergency Measures

1. Is the Emergency Coordinator available at all times to respond to emergencies?
[Env-Wm 508.04(a), 40 CFR 265.55] na
2. Are the steps to be followed in the event of an emergency posted at the nearest telephone including: [Env-Wm 508.04(b), 509.02(b)] NO
 - a) The home and work telephone number for the emergency coordinator; NO
 - b) The telephone number for the local police, fire department and hospital as well as any local or state response teams; and NO
 - c) The location of fire extinguisher, fire alarms and spill control. NO
3. Are all employees familiar with emergency and proper waste handling procedures?
[Env-Wm 508.04(c)] na

D. General Requirements for Ignitable, Reactive or Incompatible Wastes (Required of all generators)
[Env-Wm 509.02(a)(3), 40 CFR Part 265.17]

1. Separation of ignitable, reactive and incompatible wastes? na
2. "No Smoking" signs near ignitable and reactive wastes? na

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4. Hazardous waste storage area emergency equipment: [Env-Wm 509.02 (a) (4), 509.02 (b)]

hazardous waste storage area	main hwsa					
a) alarm/internal communication?	OK					
b) telephone/2-way communication?	NO*					
c) portable fire control equipment?	OK					
d) spill control/decon equipment?	OK					
e) adequate water for fire control?	NO					
f) emergency measures posted at the nearest telephone? **	NO					

NOTE: All items must be within 100 feet of each hazardous waste storage area.

* A telephone was within 100 feet of the main hwsa but it was inaccessible (behind a locked door).

** Home and office phone number(s) of emergency coordinators, phone numbers of fire, police, hospital and response personnel, and location of fire extinguisher, spill control material and alarms.

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E. Small Quantity Generator Extended Quantity and Storage Provision Requirements [Env-Wm 508.03]

1. Are weekly inspections conducted and documented for containers? na
2. Are tanks inspected on a daily basis? na
3. Are containers under the management of a designated hazardous waste manager emergency coordinator or their designee? na
4. Is the fill date marked or labelled on each container? na
5. Are containers shipped off-site within 90 days of the fill date? na
6. Does the quantity of wastes accumulated on-site exceed 1000 Kg.? na
7. Are wastes stored on-site more than one year from the original start date of accumulation? na

F. Twelve Hour Rule Provision Requirements [Env-Wm 507.01(g)]

Less than twelve hours accumulation of hazardous waste at the point of generation. Applicable to all generators of over 100 Kg. of hazardous waste per month.

1. Is the container marked or labelled with the following:
 - a) The words "hazardous waste"; and na
 - b) Words which identify the contents of the container. na
2. Is the container under the control of a trained employee? na
3. Is the container emptied at the end of a twelve hour period? na
4. Is there more than one container? na
5. Does this container exceed the 10 gallon capacity limit? na

G. Full Quantity Generator Satellite Storage Provision Requirements [Env-Wm 509.03]

1. Are the containers under the control of the process operator? na
2. Has the process operator been trained? na

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3. Upon reaching the 55-gallon or 1 quart maximum is the following being done;
- a) The fill date is marked or labelled on the container; and na
 - b) The wastes are shipped off-site within 90 days of the fill date. na
4. Subsequent to reaching the 55-gallon or 1 quart maximum at the point of generation, is the following done;
- a) The accumulated waste is moved to a designated hazardous waste storage area; or na
 - b) Any additional accumulated waste containers are marked with the initial fill date and shipped off-site within 90 days of this date. na

H. Miscellaneous Information:

1. Are there any surface waters in the proximity? unnamed brook
2. Is there potential for an imminent hazard, air or water discharge violation? OK
3. Is soil or groundwater contamination detected?
[Env-Wm 506.01(c)] OK
- If so, are the requirements of Env-Wm 702.14 met? na
4. Were any photographs taken? no
- If so, which camera was used? na
- Photographer? ---

Photo

Subject

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I. Records

1. Inspection Requirements: [Env-Wm 509.02(a)(1), adopted 40 CFR Part 265.15], adopted 40 CFR Part 265 Subpart I - Use and management of containers, adopted 40 CFR Part 265 Subpart J - tanks.

- a) Are hazardous waste inspections conducted? OK
- b) How often are inspections conducted?
(containers - weekly, tanks - daily) monthly *
(* At the time of the Inspection, JJA was conducting container storage area general inspections about once per month.)
- c) Are wastes placed in tanks or containers or both? containers
- d) Is there a written inspection schedule? OK
- e) Is there a log or checklist used to record inspections? OK
- f) does it identify the types of problems to be looked for? OK
- g) Are date and nature of remedial actions listed? OK

2. Personnel Training: [Env-Wm 509.02(a)(2), adopted 40 CFR Part 265.16]

- a) Is there a Personnel Training Plan available for review? OK
- b) Is training completed? OK
- c) Is the instructor trained in hazardous waste management? OK
- d) Does training ensure effective response to emergencies? OK
- e) Are annual reviews conducted for personnel handling hazardous waste? OK *
(* JJA's training program has been brought to its current status as of December 16, 1993. According to Bob Bean and Dan Morganti, prior to December 16, 1993, the training program was deficient and there is no record of hazardous waste personnel being trained/updated on an annual basis, because training was not complete. JJA documents that annual reviews will be conducted.)
- f) Is there a written description of training? OK
- g) Are records kept on file (3 years from termination)? OK
- h) Job title/description/name of employee? NO

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3. Contingency Plan: [Env-Wm 509.02(a) (5), adopted 40 CFR Part 265, Subpart D]

- a) Does the facility have a Contingency Plan? OK
- b) Has it been updated as necessary? NO
- c) Are there arrangements with local authorities?
(At a minimum, CP must be on file at local police, fire dept. and hospital) OK
- d) Content -
- i. emergency coordinator NO *
(* the CP needs updating, Dan Goldsmith, who moved -on from JJA, is still listed as the primary EC)
 - ii. emergency procedures NO
 - iii. emergency equipment OK
 - iv. evacuation plans NO
 - v. reporting OK

4. Manifests:

- a) Are all required parts completed?
[Env-Wm 510.03(1)] NO *
(* missing manifest document numbers)
- b) Are there any incorrect shipping names, numbers? [Env-Wm 510.03(1)] OK
- c) Are copies distributed correctly?
[Env-Wm 510.02] OK
- d) Are all required documents held for seven years? [Env-Wm 512.01] NO *
(* missing copy 8)
- e) Date of last manifest/frequency of shipments:
(according to DES Reporting Section manifest files)

Date	Manifest #	Wastes
12-30-93	MAH546493	F001/D040, F002/D040 (trichloroethylene, fluorocarbon)
11-08-93	MAH549889	F001/D040 (waste trichloroethylene)
11-08-93	MAH548437	F001/D040 (waste trichloroethylene)
09-22-93	MAH318139	F001 (w tri-ene), F001/D040 (waste trichloroethylene)
09-22-93	MAH318140	MA01/NH01 (oil waste)

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5. Does company export hazardous waste? {Env-Wm 510.06] noa) If so, Are EPA "Acknowledgement of Consents"
on file? nab) Are copies sent with each manifest? na

6. Manifest Review:

Date	Manifest #	Waste Code	Wastes (Amount)	TSD
09-22-93	MAH318139 ¹	F001/D040	415G Laidlaw Environmental Svcs.	
09-22-93	MAH318140 ¹	MA01/NH01	55G LES (NE) Lawrence, MA	
08-12-93	MAH543438 ¹	F001	110G LES (NE) Lawrence, MA	
03-31-93	MAH311861 ¹	F001	220G LES (NE) Lawrence, MA	
01-28-93	MAH301216 ¹	F001	220G LES (NE) Lawrence, MA	
12-02-92	MAA103368 ¹	F001	220G LES (NE) Lawrence, MA	
08-12-92	MAG596513 ¹	F001/NH01	385G LES (NE) Lawrence, MA	
05-13-92	MAG587725 ¹	F001	165G LES (NE) Lawrence, MA	
02-25-92	MAG581504 ¹	F001	110G LES (NE) Lawrence, MA	
11-08-93	MAH548437 ²	F001/D040	360G LES (NE) Lawrence, MA	
11-08-93	MAH549889 ²	F001/D040	440P LES (NE) Lawrence, MA	

¹: Env-Wm 510.03(1) missing manifest document number²: Env-Wm 512.01 missing manifest copy number 8, generator retains copy

J. Hazardous Waste Profile (based on 01-93 to 12-93 annual activity report)

Type of Waste	EPA Waste #	lb./Mo.	Transporter	Off Site TSD
waste 1,1,1-trichloroethane	F001	1509	LES (NE) Lawrence, MA	LES (NE)
mixed solvents (ETOH solns)	D001	83	LES (NE)	LES (NE)
lab pack - lead	D008	3	LES (NE)	LES (NE)
hydraulic oil	NH01	42	LES (NE)	LES (NE)
trichloro-ene, fluorocarbon	F002	38	LES (NE)	LES (NE)

K. Hazardous Waste Determination [Env-Wm 502.01]

one (1) 5-gallon container and one (1) 55-gallon container outside near
the warehouse

HAZARDOUS WASTE GENERATOR RCRA INSPECTION CHECKLIST

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L. Used Oil Management

1. Does the facility generate used oil? yes
2. Is the used oil being recycled? no
3. Has the used oil been tested? [Env-Wm 807.06(b) (4)] no *
(* JJA manifests the used oil as MA01/NH01)
4. Are analytical results available for review? na
5. Which of the following is the waste stream classified as:
 - a) Specification Used Oil [Env-Wm 807.02] na
 - b) Off-Specification Used Oil [Env-Wm 807.03] na
 - c) Oil classified as hazardous waste. [Env-Wm 807.04] na
6. If the oil is classified as a hazardous waste and subsequently burned for energy recovery, is it managed as a hazardous waste fuel per Env-Wm 806? na
7. Is the used oil stored in tanks or containers? [Env-Wm 807.06(b) (1)]
(indicate tank capacity if applicable) na
8. Are all containers and/or tanks marked with the words "Used Oil for Recycle"? [Env-Wm 807.06(b) (2)] na
9. Are the containers or tanks kept closed at all times except when material is actually being added or removed? [Env-Wm 807.06(b) (3)] na
10. Is the used oil shipped off-site? If **yes**, how? MA01/NH01
11. Are copies of all bills of lading and analytical results retained on-site for three years? [Env-Wm 807.06(b) (13)] na
12. Is the generator a "used oil marketer"? [Env-Wm 807.08] no
 - a) If yes, have they notified the DES and EPA of their used oil activities? [Env-Wm 807.09(b) (1)] na
 - b) Is there a batch specific code on all pertinent copies of the analytical results, manifests and bills of lading? [Env-Wm 807.09(b) (2)] na

Comments: ---

- c) Has the receiving burner or marketer notified the DES or EPA of its used oil management activities and is proof of this notification retained by the shipping marketers? [Env-Wm 807.09(b) (5)] na

Comments: ---

HAZARDOUS WASTE GENERATOR RCRA INSPECTION CHECKLIST

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III. POST INSPECTION MEETING:

A. Attended By

Bob Bean, Plant Engineering & Daniel E. Morganti, Operations Manager (JJA)

Dave Bowen, Sterg Spanos (NHDES)

B. Review

Stergios Spanos informed Bob Bean and Daniel Morganti that he will contact
DES personnel in the WSPCD regarding whether or not the temporary discharge
of non-contact cooling water needs to be permitted/regulated. Stergios
Spanos contacted Pat Reichard who said that she will contact Bob
Bean/Daniel Morganti regarding the discharge, and copy the RCRA section on
the final outcome of the matter. discrepancies/violations: hw
determinations for the contents of one (1) 5-gallon container and one (1)
55-gallon container outside near the warehouse; need to conduct inspections
according to a schedule and inspections of containers must be weekly; need
to develop documentation of hazardous waste job titles, duties description
and list of personnel in positions, and maintain training program records;
need to provide adequate water for fire protection at the main hwsa and
provide access to a telephone or other means of 2-way communication; update
and supplement the contingency plan; post the emergency measures; assign a
unique 5-digit manifest document number to each manifest; maintain the
appropriate copies of manifests for 7 years.

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C. Documents Received at Inspection

1. By DES personnel: contingency plan; inspection checklist; manifests
and LDR notices; training records and training program documentation.

2. By the company: State of New Hampshire's Hazardous Waste Rules;
Hazardous Waste Generator RCRA Inspection Checklist; Document Review
Checklist.

D. Enforcement Procedures

1. Does generator understand enforcement procedures?
(LOI, LOD, AO, RFE)

OKE. Land Ban

1. Does generator understand land disposal restrictions?
2. Do they apply to generator?

OKyesF. Requests for Information

Information Requested by State
from Facility

Date Requested
by

Date
Received

Mark Chrisos' hw trainer credentials

02-23-94

02-22-94

Information Requested by Facility

Date Sent

Container Inventory

company name: Johnson & Johnston Associates, Inc. date: February 22, 1994
storage area location: main hazardous waste storage area (hwsa)
total number of containers: 2 page 1 of 1

[illegible]



DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE
One Winter Street Boston, Massachusetts 02100

MAH 549617

86521

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. MAH093490451	Manifest Document No. 041494		2. Page 1 of 1	Information in the shaded areas is not required by Federal law.		
3. Generator's Name and Mailing Address JOHNSON & JOHNSON W5500, 130 ROUTE 111 HAMPSHIRE MA 03841					A. State Manifest Document Number MA H 549617			
4. Generator's Phone () 362-8691					B. State Gen. ID SAME			
5. Transporter 1 Company Name LAWLAN ENV. SVCS. (NORTH EAST), INC.					C. State Trans. ID MAH 12055			
6. US EPA ID Number MAH00060447					D. Transporter's Phone (508) 683-1002			
7. Transporter 2 Company Name					E. State Trans. ID			
8. US EPA ID Number					F. Transporter's Phone ()			
9. Designated Facility Name and Site Address LAWLAN ENVIRONMENTAL SERVICES (NORTH EAST), INC. 300 CANAL STREET LAWRENCE MA					G. State Facility's ID NOT REQUIRED			
10. US EPA ID Number MAH00060447					H. Facility's Phone (508) 683-1002			
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)					12. Containers No.	13. Total Quantity	14. Unit Wt/Vol	15. Waste No.
a. WASTE TRICHLOROETHYLENE					C2 DM	110	G	F901 D040
b. STATE REGULATED OIL WASTE					01 DF	5	G	MA01 HM01
c.								
d.								
J. Additional Descriptions for Materials Listed Above (include physical state and hazard code.)					K. Handling Codes for Wastes Listed Above			
a. TRICHLOROETHYLENE					a. S	0	1	c.
b. HYDRAULIC OIL					b. S	0	1	d.
15. Special Handling Instructions and Additional Information								
1a (cont.)					1b (cont.)			
1c (cont.)					1d (cont.)			
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford. IN EMERGENCY SITUATION CONTACT LAWLAN (NORTH EAST) 502-683-1002								
Printed/Typed Name John R. FELTZ, JR.					Signature [Signature]		Date 2/4/17/94	
17. Transporter 1 Acknowledgement of Receipt of Materials					Signature [Signature]		Date 2/4/17/94	
Printed/Typed Name [Name]					Signature [Signature]		Date 2/4/17/94	
18. Transporter 2 Acknowledgement of Receipt of Materials					Signature [Signature]		Date [Date]	
Printed/Typed Name					Signature		Date [Date]	
19. Discrepancy Indication Space								
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.								
Printed/Typed Name					Signature		Date [Date]	

DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE
600 Winter Street Boston, Massachusetts 02111



UNIFORM HAZARDOUS
WASTE MANIFEST

1. Manifest Number: **MA-H-549617**

2. Date of Manifest: **01/15/92**

3. State: **MA**

4. Manifest Type: **Initial Manifest**

5. Generator Name: **UNITED STATES GOVERNMENT**

6. Generator Address: **300 TOWN STREET**

7. Generator City: **BOSTON**

8. Generator State: **MA**

9. Generator Zip: **02111**

10. Manifest Title: **HAZARDOUS WASTE**

11. Waste Description: **HAZARDOUS WASTE**

12. Waste Quantity: **1000 LBS**

13. Waste Identification Number: **1000**

14. Waste Identification Number: **1000**

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100. Waste Identification Number: **1000**



- 6 1994

ITEM	WK1	WK2	WK3	WK4	WK5
<u>DRUM/CONTAINER CONDITION</u>					
evidence of leaks	No	No	No	No	
bungs tight	Yes	Yes	Yes	Yes	
labelled properly	Yes	Yes	Yes	Yes	
dates under 90 days	Yes	Yes	Yes	Yes	
corrosion evidence	No	No	No	No	
<u>GENERAL</u>					
spill equip in place	Yes	Yes	Yes	Yes	
aisles clear	Yes	Yes	OK	OK	
fire exting check	OK	OK	OK	OK	
all labels intact	OK	OK	OK	OK	
<u>SIGN OFF</u>					
Date	4/7/94	4/14/94	4/21/94	4/28	
Time	2:30	9:45	9:10	7:35	
Inspector	BB	BB	BB	BB	
Area Inspected	C.S.	C.S.	C.S.	C.S.	
Drums Inventoried	12 + 1(s)	10 + 1(s)	7	5	
		+ 14 MT	+ 14 MT	+ 15 MT	

DATE _____

COMMENTS AND REPAIRS

[illegible]

#2



JOHNSON & JOHNSTON ASSOCIATES, INC.

CHEMICAL STORAGE AREA

WEEKLY INSPECTION CHECKLIST

2425AHSN

ITEM ^{* weight}	WK1	WK2	WK3	WK4	WK5
<u>DRUM/CONTAINER CONDITION</u>					
evidence of leaks	No	No	No	No	No
bungs tight	Yes	Yes	Yes	Yes	Yes
labelled properly	Yes	Yes	Yes	Yes	Yes
dates under 90 days	Yes	Yes	Yes	Yes	Yes
corrosion evidence	No	No	No	No	No
<u>GENERAL</u>					
spill equip in place	Yes	Yes	Yes	Yes	Yes
aisles clear	Yes	Yes	Yes	Yes	Yes
fire exting check	Yes	Yes	Yes	Yes	OK
all labels intact	Yes	Yes	Yes	Yes	OK
<u>SIGN OFF</u>					
Date	2/25	3/4	3/11	3/21	3/25
Time	3:30	2:15	8:10	9:00	2:30
Inspector	RB	RB	RB	RB	RB
Area Inspected	Chem Stor	Chem Stor	C.S.	C.S.	C.S.
Drums Inventoried	10	8	7	10	11
	+ 9 MT	+ 11 MT	+ 12 MT	+ 13 MT	+ 16 MT

DATECOMMENTS AND REPAIRS

- 6 1994

		Hazardous Waste Management Training					
		STATUS DATE: 5/4/94		DATE OF TRAINING			
		TITLE		DOT		HAZ WASTE	
PERSON							
Scott	Web	Warehouse A		12/16/93		12/16/93	
J.	Carroll	Warehouse B		12/16/93		12/16/93	
Jim	Dugay	Warehouse B		12/16/93		12/16/93	
Jason	Dube	Warehouse B		12/16/93		12/16/93	
Stew	Richardson	Mfg Mgr		12/16/93		12/16/93	
Mike	Woitkun	Mfg Supv		12/16/93		12/16/93	
Scott	Remillard	Warehouse B		12/16/93		12/16/93	
Bob	Bean	Plant Eng		12/16/93		12/16/93	
Tom	Campbell	Warehouse B		12/16/93		12/16/93	
Paul	Coryea	Proc Eng		12/16/93		12/16/93	
Mike	Potenza	Reciever		12/16/93		12/16/93	
Mark	Welch	Maintenance		12/16/93		12/16/93	
Sean	Sexton	Eng Tech		12/16/93		12/16/93	
Jim	McLaughlin	Warehouse B		12/16/93		12/16/93	
G	Roix	Warehouse B		12/16/93			
Tim	Amero	Warehouse A		12/16/93			
George	Ward	Warehouse A		12/16/93			
Tom	Columbo	Eng Tech		12/22/93		12/22/93	
Butch	Cote	Maintenance		12/22/93		12/22/93	
John	Feoli	Maintenance		12/22/93		12/22/93	
John	Ranfone	Warehouse B		12/22/93		12/22/93	
Mickey	Skinner	Whse Supv		12/22/93		12/22/93	
Ed	Dooley	Warehouse B		12/22/93		12/22/93	
Don	Huot	Mfg Supv		12/22/93		12/22/93	
Rob	Smith	Whse Fore		12/22/93		12/22/93	
Dave	Webb	Warehouse A		12/22/93		12/22/93	
Dan	Goldsmith	Prodn Scheduler		12/22/93		12/22/93	
Scott	McPhee	Eng Tech		12/22/93		12/22/93	

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DATE	DESCRIPTION	AMOUNT	BALANCE
1/1	Balance	100.00	100.00
1/15	Deposited	50.00	150.00
2/1	Withdrawal	25.00	125.00
2/15	Deposited	75.00	200.00
3/1	Withdrawal	30.00	170.00
3/15	Deposited	60.00	230.00
4/1	Withdrawal	40.00	190.00
4/15	Deposited	80.00	270.00
5/1	Withdrawal	50.00	220.00
5/15	Deposited	90.00	310.00
6/1	Withdrawal	60.00	250.00
6/15	Deposited	100.00	350.00
7/1	Withdrawal	70.00	280.00
7/15	Deposited	110.00	390.00
8/1	Withdrawal	80.00	310.00
8/15	Deposited	120.00	430.00
9/1	Withdrawal	90.00	340.00
9/15	Deposited	130.00	470.00
10/1	Withdrawal	100.00	370.00
10/15	Deposited	140.00	510.00
11/1	Withdrawal	110.00	400.00
11/15	Deposited	150.00	550.00
12/1	Withdrawal	120.00	430.00
12/15	Deposited	160.00	590.00
1/1/49	Balance	590.00	590.00

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Johnson & Johnston Associates, Inc. InterOffice Memo**To:** Bill McGowan, Stew Richardson**From:** Bob Bean**Date:** April 22, 1994**Subject:** Hazardous Waste Job Descriptions

MAY - 6 1994

As a result of the audit recently performed by the **NH DES**, we were found deficient in the area of documentation of our training needs, and accomplishments. To improve this condition, we must do the following things:

1. Job descriptions for **all line operators** need to reflect the need for **up to date training in Hazardous Waste Management**, if they are called upon to assist in the removal of spent solvent.
2. Job descriptions for **all maintenance operators** must reflect the need for **up to date training in Hazardous Waste Management**, as they will be responsible for all solvent changes.
3. Job descriptions for **all warehouse operators** must reflect the need for **up to date training in Hazardous Waste Management**, as they will be called upon to assist in the movement, storage and shipment of the drums of waste.
4. An up to date **listing of training of all operators** will be **maintained by Plant Engineering**. This listing will include the names, job titles, and dates of training.
5. Any other job expected to deal with hazardous waste must also be trained, and the appropriate job descriptions changed.

Included is a sample of the job description for a **CAC "A" Operator**. Please review all job descriptions that may apply, and change as in the sample.

CC: Al Burgun, John Feoli, Dan Goldsmith, Don Huot, John Johnston, Dan Morganti, Ann Paniello, Mickey Skinner, Mike Woitkun

1. Introduction- The Purpose of this document is to establish and define the duties, responsibilities, authority, education, experience and characteristics of the position of "A" Operator for the C.A.C.
2. Basic Function- The "A Operators" basic function is to assist the technician in all aspects of operations and to stand in as "Acting Technician" in the event of the Technicians' absence.

To perform regular and preventive maintenance as instructed by the CAC Technician.

3. Reporting Relationship Authority

The "A Operator" will report to the CAC Technician and or the Shift Supervisor.

In the event of absence of the CAC Technician. All In-process Inspectors and Helpers (B Operators) will report functionally to the "A Operator

4. Responsibilities/Principle Duties- The "CAC A Operator" is charged with but not limited to the following duties.

To assist the Technician in the training of crew members.

Be capable of cleaning, operating and maintenance of all CAC equipment.

To assist in the minimization of waste of all materials used to manufacture product.

To follow all specific methods and procedures with regard to the process, operation, safety and clean room.

To be capable of quality control inspection and verify acceptance or rejection of Product, in process.

To be capable of filling out and completing all production paperwork ie. Production Logs and Quality Control Documents.

To be capable of taking accurate measurements using calipers or micrometers to insure proper product dimension.

To be capable of following and completing production schedules.

To report any safety hazards on line to the Shift Supervisor or CAC Technician.

To accept full responsibility of running line in the event of absence of the CAC Technician.

May assist in the removal of waste solvent from degreaser if trained (see education).

5. Education, experience and Qualifications

Education- The "CAC A Operator" should be a minimum of a high school or trade graduate.

Experience- The potential "A Operator" must have some experience in machine operation and or manufacturing.

Qualifications - The "A Operator" must have a strong mechanical aptitude and have the ability to read and understand procedures and instructions. Must possess basic high school mathematical skills such as understanding functions, decimals, and basic algebra. Must be able to read caliper micrometers and gauges. Blue print reading and some computer literacy is desirable.

Training- If the operator is requested to assist in Waste Solvent Removal from the degreasers, must have been thru Hazardous Waste Management Training within the previous year.

JOHNSON & JOHNSON ASSOCIATES, INC.

130 ROUTE 111
HAMPSTEAD, NH 03841
(603) 329-5691

Show this Purchase Order Number
on all correspondence, invoices,
shipping papers and packages.

No. 8447

TO

New England Fire Equip.

668-0138

DATE

4/25/94

REQUISITION NO.

0192-03
~~0573~~

SHIP TO

JJA-1

Placed with Karen

REQUISITIONED BY

WHEN SHIP

SHIP VIA

F.O.B. POINT

TERMS

B. Bean

5/10/94

BEST
WAY

Hampstead
NH

N-30

QTY. ORDERED

QTY. RECEIVED

STOCK NO. / DESCRIPTION

UNIT PRICE

TOTAL

1.

AMREX #630 - 33 GAL
FFFP FOAM, WHEELED
UNIT

\$ 1995.-

Fire Prevention per
state mandate for
chemical storage and
Waste Area.

MAY -6 1994

Rosa Sello
Dan Mangano
B.P. Bean

AUTHORIZED BY

1. Please send _____ copies of your invoice.
2. Order is to be entered in accordance with prices, delivery and specifications shown above.
3. Notify us immediately if you are unable to ship as specified.



NEW ENGLAND FIRE EQUIPMENT CO.
Fire Protection Specialists

#5

April 22, 1994

JJA Incorporated
130 - Route 111
Hampstead, NH 03841

Attn: Bob Bean

Dear Bob:

Per our meeting together on April 22nd, you asked me to follow up in writing with the following recommendations.

Amerex, model #630 Alcohol Resistant FFFP Foam Wheel Unit, UL Rated, 20A-160B, cost \$1,995.00. Lead time, one to two weeks.

Also, you may want to give consideration to purchasing numerous 2 1/2 gallon FFFP portable fire extinguishers. Amerex, Model #252 rating 3A-20B, cost \$130.00 each, lead time one to two weeks.

The above items are recommended to be located in your dock area to protect your high hazard chemical storage area.

New England Fire Equipment Company appreciates this opportunity to submit our quotation on these items and we appreciate continuing to provide quality fire protection and inspecting and servicing your facilities portable fire extinguishers.

Also per our conversation together our engineer, Chris Hill will be contacting you shortly to set up a complete engineered survey of the three machine hazards which we discussed.

Please contact me at your earliest convenience with authorization and I would be happy to order and schedule delivery of these items.

Thank you,

Tom Elwell

Tom Elwell
0399.TE/kap

- ☐ 154 Fletcher Street • Lowell, MA 01854-4137 • 508-452-3779 - Fax # 508-441-0261
- ☐ 880 Candia Road • Manchester, NH 03109-5205 • 603-668-0138 - Fax # 603-668-6755